1   come to Joe's Communication and Mr. Dawson says

2   yes, using the same type of scenario you would on

3   the IXC side to get someone to switch to MCI or

4   AT&T to keep the third-party verification stuff,

5   under those circumstances if the CSR's identified

6   as being one that's on a pending sale, we will

7   give it without it, and we'll look for the order

8   to come in.

9   Q.   So what you're saying is that let's say it was --

10   MCI was the CLEC who was about to sign up Mr.

11   Dawson, unlikely as that might be.

12   A.   I would hope so.

13   Q.   Let's say that Mr. Dawson called up MCI and was

14   thinking about becoming a customer and in fact

15   agreed to become a customer. You're saying,

16   you're suggesting that Ameritech would provide the

17   CSR record to MCI immediately at that point

18   without requiring MCI to send the written LOA?

19   A.   If it's under the condition and I'm not, you know,

20   if it's the same type of requirement that is done

21   under the IXC to get Mr. Dawson to take them as

22   their long distance carrier, then, yes, we would

23   provide that CSR without the letter of

24   authorization.

25   Q.   Still on the preordering functions here, do you

1   know whether Ameritech's preordering OSS system

2   allows a CLEC to view the available interexchange

3   carriers in a customer's exchange area?

4 A. I don't believe it does, no. I believe that's

5   data that's provided to a CLEC. I don't believe

6   it's provided over the preordering interface.

7 Q. But that's information that the CLEC would be able

8   to have when they're talking to a customer, a

9   potential customer?

10 A. I believe that's data similar to the street

11   address guide or the feature availability where it

12   would be a list of available interexchange

13   carriers would be provided. I'm not sure whether

14   that's provided on a electronic or paper form.

15 Q. But would you agree it would be important for a

16   CLEC when they're in the process of selling a

17   customer in their new local service to be able to

18   tell the potential customer who the potential long

19   distance carriers they might select --

20 A. I would assume that MCI would know that, the one

21   they prefer them to take. But, yes, I would agree

22   with you, other potential long distance carriers

23   should be available to them.

24 Q. But if that potential customer wanted somebody

25   other than MCI to handle the long distance piece

1   of it, MCI would --

2 A. Yes, I agree with you.

3 Q. It would be important?

4 A. I agree.

5 Q. Do you know whether Ameritech is providing some

6   type of interface so MCI can determine who the

7   available -- in a resale circumstance, who the

8   available long distance providers are at a

9   particular switch?

10 A. I believe -- I'm not sure of the exact format that

11   that data is provided. But I do believe that it

12   is provided either under a disk or in a paper

13   form. But it's equivalent to the type of data

14   that's provided to customer service or customer

15   service reps. They use an M&P document.

16 Q. But that's not on the -- does that show up as data

17   on the EDI screen?

18 A. The existing PIC would be on the EDI, the CSR.

19   But the additional ones, no, it would not.

20 Q. Do you know how Ameritech customer service

21   representatives are able to tell customer --

22 A. I believe it's M&P documentation.

23 Q. Is that something that appears on the Ameritech

24   customer service representative's computer screen?

25 A. They have electronic access to the electronic M&P

1   which is an electronic paper.

2   Q. I guess then what I'm asking is will Ameritech

3   provide that same electronic format of the PIC

4   availability to CLECs?

5   A. And I believe that we have. I believe that they

6   have provided -- I think we're having some --

7   missing each other here. My belief is that the

8   Ameritech service reps use methods and procedures,

9   you know, documents, to be able to determine what

10   PICs are available. I believe we provide that

11   information to the CLEC. Whether we provide the

12   internal Ameritech M&P or some separate document

13   or some separate file with available PICs, I'm not

14   sure.

15   Q. Okay. You've testified earlier that I think this

16   is -- we're now looking at ordering of unbundled

17   network elements. I realize we're moving around a

18   little bit. But ordering of unbundled network

19   elements. I believe you testified that loops

20   could be ordered through the EDI interface?

21   A. No, I did not.

22   Q. Do I have it backwards? Why yes, I do. You

23   testified that line side switching could be

24   ordered through the EDI interface?

25   A. That's correct.

1 Q. But loops would have to be ordered through the ASR

2   interface?

3 A. That is correct.

4 Q. Now, moving aside from the question of common

5   transport, do you know how MCI would be able to

6   order a combination of a loop and a line side

7   switch?

8 A. That would be over the EDI interface.

9 Q. They could order the loop also over the EDI

10   interface?

11 A. If it's -- well, when unbundled elements get

12   rebundled, we don't order them as piece parts. We

13   make up a third product that would be that. So

14   instead of it being, you know, ordering an

15   unbundled port and an unbundled loop and put them

16   together, we would make product C that's an

17   unbundled loop and an unbundled port. So it would

18   come to us in that case, it would look real

19   similar if not exactly the same as a resold line

20   order except for the class of service which

21   identified it as an unbundled element.

22 Q. Do you know if Ameritech has already put together

23   such a product as you've just described, its own

24   version of a product with an unbundled line side

25   switch and a loop?

1   A.   I believe as a result of some interconnection

2   agreements we do have to offer that. I'm not sure

3   if from the product side whether or not they have

4   definitively given the information out and defined

5   what happens within the switch.

6   Because on all, on the unbundled

7   switching, there is a component that has to be

8   built within the switch that determines how the

9   calls are processed and all that, and then the

10   class of service will point you to those,

11   routing. Once that is done, then that class of

12   service is what is given to us to do the

13   ordering. So it's like to me just like call

14   waiting or call pick up. Just another feature.

15   Q.   Sounds as if we're speaking in the abstract a

16   little bit. And I just want to turn it to the

17   concrete if we could. I'd like to know whether or

18   not MCI could order that combination today using

19   an electronic interface, a single electronic

20   interface?

21   A.   Could MCI order using just common or I can't even

22   -- I don't know what the term would be, as far as

23   the switching side, if the actual network was

24   built behind no matter what type it was, yes, they

25   could use an EDI interface.

1   Q.   So MCI you're telling me today would not need to

2   put in separate orders for the different

3   components?

4   A.   For the one that you gave which is an unbundled

5   switching port and the loop, that would go on the

6   same order.

7   Q.   I take it that breaks down though if we were to

8   add common transport?

9   A.   Well, Counsel, common transport, I mean this all

10   gets confusing because even though they're put

11   together from an ordering perspective, I don't

12   want -- not from ordering perspective, from a

13   definition perspective, from an implementation and

14   a switch perspective they can't. I mean you can't

15   buy a one-fortieth of a trunk group or

16   one-fortieth of a trunk whenever you put a line

17   in. So from the perspective of how things are

18   built, we built it on the same scenario you use on

19   the IXC side.

20   On the IXC side you use the ASR process

21   to build your network and put all your switches in

22   and put all the links between your switches. Once

23   you have the switches built, you use a separate

24   interface to add the lines to that network.

25   That's the same thing we're doing with -- on the

1   unbundled local switching side. Anything that's

2   network based you would use the ASR process to

3   build your network, and then you would use the EDI

4   process to put a line onto the network.

5 Q. But still that would require use of two separate

6   interfaces and two separate orders if that's what

7   MCI wanted to do?

8 A. If MCI wanted to build a network and put lines on

9   it with one order, could they do that, is that

10   what you're asking?

11 Q. For a single customer, single line, single line

12   side switch and line port on the other side, trunk

13   port on the other side?

14 A. Counsel, I have trouble figuring out what that

15   order would look like.

16 Q. Thank you. Page 10 of your direct testimony, I'll

17   read it so you don't necessarily have to find it

18   unless you hear an error in my reading. You

19   testified that there is no need for a mechanized

20   interface for verifying order status or completion

21   because most unbundled loop orders are coordinated

22   with the other carrier?

23 A. That's correct.

24 Q. Doesn't that statement require an assumption on

25   the side of the CLEC that they would have the

1   capacity to manually track some number of orders

2   for unbundled network elements?

3 A. I don't understand the correlation between the

4   two.

5 Q. Well, you would agree with me that if a CLEC was

6   processing or monitoring orders for five unbundled

7   loops, that it wouldn't take too many CLEC

8   employees to manually track the status and

9   coordinate that small number of loops, right?

10 A. Counsel, what this is alluding to is when we put

11   unbundled loops and coordinate which means there

12   is a CLEC person at the other end who is putting

13   the wire in at the same time we're putting the

14   wire in. So they know they put the wire in, they

15   know it's completed,.

16   MR. PAULSON: Can the reporter read back

17   my question?

18   (Record read.)

19   THE WITNESS: Yes.

20 BY MR. BERNS:

21 Q. My follow up would be if the CLEC were processing

22   1,000 orders for unbundled loops that it might

23   begin to tax the capacity of the CLEC to

24   coordinate those loops on a manual basis or to

25   monitor the progress of those loop orders on a

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1   manual basis getting on the phone with the ILEC?

2   A.   The CLEC's involved with the completion of those

3   orders. The CLEC is on the phone when that order

4   is completed.

5   Q.   The CLEC isn't on the phone the entire time

6   between the ordering and the actual connection of

7   the element?

8   A.   No, but they are when the order is completed which

9   is what you're questioning on. They're not during

10   the processing. But when the order is completed,

11   we have to physically move the line from

12   Ameritech's network and put it on the CLEC's. And

13   the CLEC is on the phone when we do that to make

14   sure that the customer -- and there is dial tone

15   at the CLEC.

16   Q.   At the very instant that they're moving the line?

17   A.   That's correct.

18   Q.   That's true.

19   A.   And that's when the order is complete because

20   that's when the customer has service.

21   Q.   But up to that point you're suggesting that the

22   only way that a CLEC could know the status of an

23   order is for the CLEC to call Ameritech in this

24   case?

25   A.   That is correct.

1   Q. They don't go through an electronic interface to

2   find out the status?

3   A. That is correct.

4   Q. Okay. Just a few more questions, Mr. Rogers. Do

5   you know what type of interface a CLEC would

6   currently use to order DID trunks?

7   A. DID trunks?

8   Q. Resale.

9   A. Resale, I believe it would be --

10   Q. I'm sorry, did I hear the answer?

11   A. I believe that would be EDI.

12   Q. Okay. I take it that's something you've

13   investigated since last Monday?

14   A. Yes, it is.

15   Q. So last Monday for some reason, you weren't aware

16   of that last Monday though?

17   A. I wasn't sure. And since I was under oath, I

18   didn't want to guess.

19   Q. Always smart. Do you know what interface a CLEC

20   would use to order a Centrex service on a resale

21   basis?

22   A. EDI.

23   Q. Do you know whether Ameritech's EDI interface

24   currently allows MCI to order Centrex service?

25   A. Yes, it does.

1   Q.   Do you know if that's been communicated -- excuse

2   me. Do you know who at MCI that's been

3   communicated to?

4   A.   I wouldn't -- one of my implementation managers

5   would have to communicate. I mean the electronic

6   service ordering guide does have Centrex and does

7   have examples of Centrex I believe. We are

8   getting Centrex orders already interface. So not

9   from MCI but we are getting orders over the

10   interface for Centrex.

11   Q.   Are you aware that MCI has requested meetings with

12   Ameritech to have it explained to MCI just how

13   they could order Centrex over the EDI interface?

14   A.   No, I'm not aware of that.

15   Q.   Are you aware that MCI has been told they have to

16   order Centrex using manual forms?

17   A.   No, I am not aware of that.

18   Q.   That's news to you?

19   A.   That's news to me. Counsel, let me add something

20   to that previous answer. I believe for adding

21   Centrex lines, I won't say I believe, I know for

22   Centrex lines that you use the EDI interface. But

23   I also believe that things like building the

24   Centrex common block and that type of stuff may be

25   done on paper because that's the way it's done on

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 1          the retail side.  So I'm not sure whether that's

 2          what they were alluding to or not.

 3     Q.   AT&T may have already asked you this question, do

 4          you know how a CLEC would order ISDN?

 5     A.   That would be the EDI interface too unless it's

 6          ISDN prime.  I haven't been able to definitively

 7          determine which interface we use for that.

 8     Q.   Same question then as before, would it surprise

 9          you to hear that MCI has been told that they would

10          have to use manual forms to order ISDN?

11     A.   Yes, it would.

12     Q.   Page 41 of your direct testimony.  I'll tell you,

13          your testimony states that CLECs will be given at

14          least 60 days notice prior to any change in the

15          version of an ordering interface?

16     A.   Yes.

17     Q.   Isn't it true that most recently when Ameritech

18          announced a change in the standard it was set to

19          take effect April 7th?

20     A.   I believe that's the case, yes.

21     Q.   Are you aware that MCI wasn't notified until

22          February 22nd I believe?

23     A.   I believe it was somewhere around that date, yes.

24     Q.   So that's about 42 days?

25     A.   If that's the math, yes.
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1   Q.   Okay.

2   A.   The interface, I mean the date was also because of

3   that was also pushed off.

4   MR. BERNS: Mr. Rogers, I have nothing

5   more for you.

6   EXAMINER JAMES: Ms. Bowles.

7   Cross-Examination

8   By Ms. Bowles:

9   Q.   Thank you. Mr. Rogers, I'm Julie Bowles with

10   Sprint. I just have a couple of questions for you

11   this afternoon. On page 16 of your direct

12   testimony on the first paragraph, line 2, you

13   indicate that the subsystem you're speaking of in

14   this testimony only represents the only unique

15   piece of software needed to facilitate order

16   entry. Can you expand on what you mean by that?

17   A.   Yes. The interfaces that we created, all they do

18   is convert the order into a standard Ameritech

19   service order and put it into the same downstream

20   systems for processing.

21   Q.   Is this generally industry supported, this piece

22   of software? Is this unique to Ameritech?

23   A.   The software itself? The EDI standard is. And

24   EDI systems when people -- when industries

25   implement EDI in there, that's usually what they

1   do, they take the electronic purchase orders and

2   convert it into whatever internal format they use

3   and put it in their existing systems.

4 Q. Was this specifically designed for local service

5   provision?

6 A. Yes, it was.

7 Q. Okay. Also on page 16 near the bottom of the page

8   you've testified that the testing approach was to

9   create test cases that would mimic the range of

10   resell orders?

11 A. Yes.

12 Q. Could you further describe that? Was this with

13   numerous CLECs, with complex CLECs?

14 A. It was just a take based on the forecasts and

15   based on whatever marketing information was

16   available at the time. It was to take a sampling

17   of different types of customers and different

18   types of services that likely we would receive

19   like orders for and send them through the system

20   for testing.

21 Q. On page 18 of your testimony in the last paragraph

22   you indicate that syntactical error occurring in

23   the format of a message does not meet

24   specifications?

25 A. That's correct.

1   Q.   Is the specifications, the system design,

2   supported by other RBOCs or CLECs?

3   A.   Specifications.

4   Q.   The system --

5   A.   What this is getting at is that the specifications

6   for the interface were published. And that

7   syntactical errors if they are against the

8   published specifications, then they drop out.

9   Q.   But these specifications are just for Ameritech?

10   A.   Let me figure out what context.

11   Q.   Are they just Ameritech specific specifications?

12   A.   The interfaces are based on the existing industry

13   standards that were in place when we did this.

14   The industry standards do not and did not support

15   the full range of wholesale offerings. So would

16   they be only Ameritech, yes. But they are -- I

17   think we're the only one that's really doing to

18   this degree EDI interface.

19   Q.   On page 29 of your testimony in the first

20   paragraph you indicate that during the remaining

21   nine months of 1997 based on forecasted demand we

22   plan to add additional capacity which will

23   quadruple system capacity?

24   A.   Yes.

25   Q.   Would you believe that if flawed forecasts or no

1   forecast for one or more CLECs would impact

2   Ameritech's retail and other CLECs?

3   A.   I'm sorry, I don't understand that question.

4   Q.   If any of these forecasts were flawed or if

5   certain CLECs did not give you any forecast, would

6   it change the results that you have here?

7   A.   These results are because -- based on some CLECs

8   doing just what you said. These are the results

9   based on CLECs not providing us forecasts. Not

10   all CLECs not providing us forecasts.

11   MS. BOWLES: I have no further

12   questions.

13   EXAMINER JAMES: Mr. Hughes.

14   MR. HUGHES: Thank you.

15   Cross-Examination

16   By Mr. Hughes:

17   Q.   Mr. Rogers, I have a couple questions. When you

18   use the phrase the systems are fully tested and

19   operational, what do you mean by that?

20   A.   Well, that they went under testing both by the

21   vendors in the case when we had third-party

22   providers and that they went through integration

23   testing once we received them. We tested the

24   system.

25   Q.   Does that phrase encompass the thought that

1   whatever flaws were uncovered in the testing had

2   been remedied?

3 A. Yes, it does.

4 Q. So when you say something is fully tested and

5   operational, you mean that there are no flaws you

6   are aware of in the systems that are still out

7   there unfixed?

8 A. I don't think I could categorize it as absolutely

9   no flaws in the system. I don't think that I

10   could ever, you know, categorize that there are no

11   flaws in the system or any other system that is

12   developed. There is no flaws that would impair a

13   provider from doing business with it.

14 Q. Since the time you submitted your testimony you

15   have learned that there are at least a handful of

16   errors with respect to the MORTEL system, isn't

17   that --

18 A. That is correct.

19 Q. And since you became aware of that fact, does that

20   change your opinion as to whether your systems are

21   fully tested and operational?

22 A. It doesn't change my testimony as of when I filed

23   it. But I do concede that there are some flaws or

24   some errors that need to be resolved with the

25   systems.

1   Q.   Okay. So your state of knowledge today is there

2   are some errors there that have to be fixed before

3   you can state with confidence under oath that your

4   systems are fully tested and operational?

5   A.   That is correct.

6   MR. HUGHES: That's all I have.

7   EXAMINER JAMES: Anyone else before the

8   staff?

9   (No response.)

10   EXAMINER JAMES: Mr. Kelley.

11   Cross-Examination

12   By Mr. Kelley:

13   Q.   Mr. Rogers, you've reviewed Ms. Wiecki's direct

14   and rebuttal testimony, have you not?

15   A.   Yes, I have.

16   Q.   And directing your attention to your own rebuttal

17   testimony at page 7.

18   MR. DAWSON: Do you have that, Joe?

19   THE WITNESS: Yes, I do.

20   BY MR. KELLEY:

21   Q.   About the middle of the page, there is a question

22   have you reviewed Ms. Wiecki's opinions in which

23   she purports to find a correlation between the

24   frequency of missed due dates and whether the

25   underlying order was processed manually or

1   electronically. You answered in the affirmative.

2   And then you were asked to comment upon her

3   opinions, and your answer began, I do not know how

4   Ms. Wiecki made the calculations upon which she

5   relies, and so I am not able to agree or disagree

6   with the arithmetic in her testimony.

7   My question to you is did you ask to see

8   Ms. Wiecki's calculations?

9   A.   No, I did not.

10   Q.   At page 8 of your rebuttal testimony.

11   A.   Okay.

12   Q.   The question and answer in the center of the page,

13   I'll characterize it, and if you dis-- question

14   was to the -- the question asked whether you

15   agreed with assertions of Ms. Wiecki and Mr.

16   Connolly that the frequency of orders processed

17   manually should be of concern to this commission.

18   And you answered in the negative; is that correct?

19   A.   That's correct.

20   Q.   And you based that answer on your experience

21   stating in fact that in practice there is no

22   difference?

23   A.   That's correct.

24   Q.   Just how complete is your experience? For

25   example, are transactions processed when you are

1   not physically present, you're not directly

2   involved in the process?

3 A.   Yes, they do.

4 Q.   And you are not -- you do not have personal

5   knowledge of how every single transaction is

6   processed, do you?

7 A.   That is correct.

8 Q.   So that the experience to which you refer at page

9   8 of your rebuttal is a limited kind of

10   experience?

11 A.   It's based on some reports that we have, right,

12   from other proceedings.

13 Q.   So it's based on indirect knowledge submitted to

14   you?

15 A.   Yes.

16 Q.   In report form or however by people whose job it

17   is among other things to supply you with

18   information?

19 A.   That is correct.

20 Q.   Referring you to page 9 of your rebuttal

21   testimony.

22 A.   Okay.

23 Q.   And that's connected with your initial testimony

24   at page 22 where you were talking about AT&T's

25   entry into the market in Michigan on March 10,

1   correct?

2   A.   That is correct.

3   Q.   And the 76 and 85 percent figures which are given

4   in the second complete question and answer on page

5   9 of your rebuttal testimony is based on that

6   example?

7   A.   Yes, it is.

8   Q.   Michigan example?

9   A.   Yes, it is.

10   MR. DAWSON: Excuse me, Glenn, I don't

11   know that your word example is ambiguous. I think

12   what is testified to is the experience in Michigan

13   is actual fact, not hypothetical or test, is that

14   what you meant to say?

15   MR. KELLEY: Yes. I didn't mean example

16   in the sense of hypothetical.

17   MR. DAWSON: Excuse the interruption.

18   MR. KELLEY: No problem.

19   BY MR. KELLEY:

20   Q.   And what is the underlying support for your

21   claimed percentage of 76 and 85 percent?

22   A.   The actual orders that came through the system.

23   Q.   Okay. And have the calculations underlying those

24   orders been made available to you? Have you

25   viewed the calculations on which the orders were

1 based?

2 A. Yes, I viewed them, yes. They were also shared

3   with AT&T.

4 Q. Okay.

5   MR. KELLEY: Nothing further.

6   EXAMINER JAMES: Any recross before we

7   go to the redirect?

8   (No response.)

9   Examination

10 By Chairman Parrino:

11 Q. In response to cross-examination by Ms. Marsh she

12   was getting at she gave you a number of exhibits

13   that were entered. For example, Exhibit 7 was an

14   order testing problem log, Exhibit 8 was a resale

15   bugs not fixed sort of log. And in response to

16   her questions you said that you had specifically

17   not reviewed those logs.

18   Now, in making the claim in your

19   testimony that the OSS is fully operational, were

20   there other logs that you reviewed specific

21   underlying data that you personally reviewed to be

22   able to make those claims?

23 A. Just aggregate data. One of the issues I was

24   going through here is most of these are related

25   just to one system which makes up a piece of the

1   interface. And the piece that I have the most

2   responsibility for because besides overall

3   coordination of all the TA 96 OSS stuff, I still

4   have the development for this piece. But the way

5   I did all of them was an aggregate data from all

6   the different interfaces. And I didn't treat the

7   one that I had internally any differently because

8   it was internal interface. So I used aggregate

9   data provided to me and reports provided to me,

10   talking to the individual people responsible for

11   the systems.

12   I'm not a paper person, I like to sit

13   the person in front of me and have them tell me

14   how the systems are working and actually put my

15   hands on it and do CSR requests or use a test tool

16   and send a few orders through to make sure it

17   works. I'm suspect of most reports that are

18   printed out.

19   Q.   Let me make sure that I understand then. The

20   impression I'm left with is the basis for the

21   statements in your testimony is that you had

22   meetings with the individuals who are responsible

23   for the components, the programs or the underlying

24   systems. And they gave you their impression of

25   whether or not the systems were functioning?

1   A.   And the subject was what is the extent that the

2   interfaces are operational, what type of problem,

3   customer problems would a CLEC encounter if they

4   were using these systems, those type of

5   questions. It wasn't a let's go down every case

6   of trouble you've had or let's go down every test

7   group you've had.

8   Q.   So did you get any sort of reports that gave you

9   some sense of what errors were occurring with what

10   frequency, what percentage were priority issues or

11   priority problems? I mean what analytical

12   information did you review to come to the

13   conclusion that the systems were operational?

14 A.   Well, I've been involved with this since August of

15   '95. So I've had my finger on it through the

16   entire process. So I didn't use one separate

17   sitting, one thing, you know, say okay, fine, now

18   from this date everybody tell me what has

19   happened, what is done and where we're at and what

20   problems still exist. I used the time, experience

21   that I've had on the job to say this is working

22   based on all the problems that have been escalated

23   to me over the course of that year-and-a-half and

24   all the issues that were still outstanding and

25   meeting with customers.